



PUBLIC HEALTH DIVISION
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Portland Harbor Superfund Comments
U.S. Environmental Protection Agency
805 SW Broadway, Suite 500
Portland, Oregon 97205

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Portland Harbor Superfund Clean-up Team:

Thank you for this opportunity to comment on the October 2018 Proposed Explanation of Significant Differences (ESD) for the Portland Harbor Superfund Site. The Oregon Health Authority (OHA) is generally pleased to see progress towards clean-up of this site that is so important to so many communities in Oregon.

OHA's comments are focused on the description and explanation of non-cancer risks related to the recent oral reference dose (RfD) for benzo(a)pyrene (BaP) published in the January 2017 toxicological review by the EPA's Integrated Risk Information System (IRIS).

General comment

The ESD appropriately cites and describes the application of the updated oral cancer slope factor (CSF) for BaP presented in the January 19, 2017 IRIS review to derivation of clean-up levels (CULs) at the Portland Harbor Superfund Site. However, the ESD does not make explicit EPA's treatment of the new non-cancer RfD for BaP published in that same January 19, 2017 IRIS review. It is likely that cancer risk, even with the 7-fold less potent CSF for BaP, will continue to be the overall driver of risk and CULs rather than non-cancer risk calculated using the new BaP RfD; the ESD should make that explicit.

Specific comments

- OHA recommends inserting a paragraph describing EPA's assessment/treatment of the non-cancer RfD for BaP on page 9 of the ESD following the paragraph describing the change to the CSF.
- A similar paragraph should be inserted after the first paragraph on page 20 of the current ESD.
- OHA recommends the ESD include a comparison between CULs calculated using the updated CSF based on cancer risk and CULs calculated using the new RfD for BaP based on non-cancer risk in section 3.1 of the ESD. These comparisons should be made for each exposure scenario in remedial action objectives 1 and 2 and should be further summarized in a new table following table 1 of the current ESD.
- The first sentence under "Summary of Significant Changes" in section 4.0 should include mention of the effect of changes in the non-cancer RfD for BaP as well as the CSF.
 - Describing those effects in the summary could be accomplished by inserting a new summary bullet in section 4.0 explaining that updates to non-cancer risk based on the new RfD for BaP published in the January 19, 2017 IRIS review did not warrant any additional changes to CULs and providing the explanation justifying this conclusion.

OHA has received questions from the public about the non-cancer risks associated with benzo(a)pyrene in the context of the Portland Harbor Superfund Site cleanup. Oregon relies upon the authoritative work of EPA's science program to assess and communicate to the public about health risks to humans from environmental exposures. The development of an oral reference dose for non-cancer risks of benzo(a)pyrene is a valuable contribution to this work and is as important as the update to the oral cancer slope factor for cancer risk from this chemical. In the context of the strong community interest in the Portland Harbor cleanup, it is vital to have public confidence that all relevant risks that can be evaluated are reflected in EPA's analysis.

Thank you for the opportunity to comment on this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Andre Ourso", is positioned below the word "Sincerely,".

André Ourso
Administrator
Center for Health Protection
Public Health Division